

03.01-8/28/02-02505

**Jackson, Rodger W. (EFDLANT)**

**From:** Rich, Corey [RichC@ttnus.com]  
**Sent:** Wednesday, August 28, 2002 3:33 PM  
**To:** 'George Lane'  
**Cc:** Zimmerman, Gregory; 'Doug Bitterman'; 'Jeff Christopher'; 'Michelle Thornton'; Jackson, Rodger W. (EFDLANT); 'Taylor Sword'  
**Subject:** RE: OU1 Draft Final RTCs



RTC-NCDENRDL-Draft  
Final RI.doc...

George,

The attached file contains the formal responses to the comments. I believe I discussed the responses with you and the team at the July partnering meeting but I must not have submitted a formal set of responses. I had anticipated submitting them with the final version of the report. I don't believe our responses will have much of an impact on next weeks telecon.

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<<RTC-NCDENRDL-Draft Final RI.doc>>

> -----Original Message-----

> From: George Lane [SMTP:george.lane@NCMail.net]  
> Sent: Wednesday, August 28, 2002 10:55 AM  
> To: Rich, Corey  
> Subject: OU1 Draft Final RTCs

>

> Corey,

>

> Dave Lilley had three comment to the Draft Final. Have you sent your  
> replies to these comments yet? If you have, please resend. If not, we  
> would like to have them before the telecon on 5 Sept.

>

> George

OK with responses  
Dave is ~~concerned about~~

**Comments – NCDENR, Dave Lilley, May 22, 2002**  
**Draft Final Operable Unit 1 Remedial Investigation Report**  
**MCAS, Cherry Point, NC**  
**Dated May 2002**

**Specific Comments – Human Health Risk Assessment:**

1. **Appendix M, Table 2.2:** In an attempt to reproduce the DDT and Aroclor-1260 screening levels, it was discovered that, for the inhalation of volatiles using Method 1, the default climate zone for the City of Los Angeles was used. A check of 2-butanone and acetophenone in table 2.5 shows the same climate Zone default was used. Please correct or explain why the default climate zone was determined to be more appropriate than the one for Raleigh-Durham.

**Response:**

**Agree with qualification. The Screening Levels (SSLs) were obtained from EPA's Soil Screening Guidance: Technical Background Document. The SSLs presented in this guidance document have been derived using the City of Los Angeles as the default climatic zone. Therefore, to be consistent with the values presented in the guidance document, the City of Los Angeles climate zone was used to calculate the SSLs for those chemicals not having SSLs in the guidance document.**

**It should be noted that EPA uses the City of Los Angeles as the default climatic zone for deriving SSLs for inhalation of volatiles because this climatic zone results in the most conservative SSLs. For example, the SSLs for Aroclor-1260 and DDT derived using the City of Los Angeles as the climatic zone are 1.9 mg/kg and 750 mg/kg, respectively. The SSLs for Aroclor-1260 and DDT derived using Raleigh-Durham as the climatic zone would be 2.1 mg/kg and 850 mg/kg, respectively.**

**No changes are planned.**

2. Appendix M, Table 2.2, a screening value can be calculated for naphthalene and used for 2-methylnaphthalene by using the web site cited in the footnotes. Please correct.

**Response:**

**Agree with qualification. It may be appropriate to use the inhalation RfD for naphthalene as a surrogate for 2-methylnaphthalene, but because of the differences in the fate and transport parameters (e.g., Koc, Henry's Law Constant), the Navy does not feel it is appropriate to use the SSL for naphthalene as a surrogate for 2-methylnaphthalene.**

However, a SSL for 2-methylnaphthalene (330,000 ug/kg) can be calculated using the methodology presented in the SSL guidance document, the transport parameters for 2-methylnaphthalene, and the RfD for naphthalene as a surrogate. Comparing 1/10 of this calculated value (33,000 ug/kg - standard screening practice for noncarcinogens) to the concentrations detected in the soil samples indicate that the only exceedance of this calculated SSL would be the maximum concentration at Site 16 (120,000 ug/kg). The exposure point concentration calculated for 2-methylnaphthalene at Site 16 is 585 ug/kg. Consequently, the risks associated with inhalation of 2-methylnaphthalene at Site 16 would be well below the unacceptable HQ of 1. No corrections to the document are proposed at this time.

**Specific Comments – Ecological Risk Assessment:**

1. Page 7-50, section 7.8: Arsenic and nickel have been dropped from the list of chemicals that, to a lesser degree, pose some potential risks. In a comparison of the old and new tables, nothing seems to have changed. Why were arsenic and nickel dropped?

**Response:**

As changes were being made to the draft version of Section 7 of the RI report, the data were reviewed to ensure that statements made in the text were, in fact, correct. Based on this review of the data, it was determined that arsenic and nickel did not warrant being listed in Section 7.8.

As noted in the Step 3A discussion for arsenic on page 7-30, although some potential risks in the terrestrial food-chain modeling appear to be present from arsenic, these risks do not appear to be widespread. The highest concentration of arsenic was detected in a soil sample from the Site 16 landfill (OU1-SO-SS1). The concentrations of arsenic found in the surrounding samples were within the range detected in the background samples and do not represent site conditions. Because of the isolated nature of this high detection, it does not appear that arsenic should be retained as an ecological COC. Therefore, it was removed from the list appearing in Section 7.8.

The Step 3A discussion for nickel notes on page 7-38 that, on the whole, widespread potential risks from nickel do not appear to be present at OU1. Therefore, it was also removed from the list appearing in Section 7.8.